

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

NEW MEXICO UNITED FOOD AND  
COMMERCIAL WORKERS UNION'S AND  
EMPLOYERS' HEALTH AND WELFARE TRUST  
FUND, on behalf of itself and all others similarly  
situated,

Plaintiff

v.

PURDUE PHARMA L.P., *et al.*,

Defendants.

07-CV-6916 (JGK)

Electronically Filed

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Matthew T. McLaughlin, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Paul F. Strain  
Venable LLP  
PNC Bank Building  
Two Hopkins Plaza  
Suite 1800  
Baltimore, MD 21201  
Telephone: (410) 244-7400  
Fax: (410) 244-7742

FILED  
U.S. DISTRICT COURT  
2007 NOV -9 PM 2:37  
S.D. OF N.Y.


Paul F. Strain is a member in good standing of the Bars of the State of Maryland, the State of Connecticut and the District of Columbia. There are no pending disciplinary proceedings against Paul F. Strain in any State or Federal Court.

632331 11-9-07 mg  
52 \$ 133239

Dated: November 9, 2007  
New York, New York

Respectfully submitted,

By:



Matthew T. McLaughlin (MM-6241)  
VENABLE LLP  
The Chrysler Building  
405 Lexington Avenue, 62<sup>nd</sup> Floor  
New York, New York 10174  
Telephone: (212) 307-5500  
Fax: (212) 307-5598

*Attorneys for Defendants Abbott  
Laboratories and Abbott Laboratories, Inc.*

**CERTIFICATE OF SERVICE**


I, Michael C. Hartmere, hereby certify that on November 9, 2007, I caused a true and correct copy of the foregoing **Motion to Admit Counsel Pro Hac Vice**, to be served via United States mail, postage prepaid, on counsel of record to all parties in this case at the following addresses:

Christopher Adam Seeger, Esq.  
Seeger Weiss LLP  
One William Street, 10th Floor  
New York, NY 10004  
212-584-0700

*Attorneys for Plaintiff New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund, on behalf of itself and all others similarly situated*

Alexandra Katherine Nellos, Esq.  
Mary Therese Yelenick, Esq.  
Donald I. Strauber, Esq.  
Phoebe Anne Wilkinson, Esq.  
Chadbourn & Parke LLP (NY)  
30 Rockefeller Plaza  
New York, NY 10112  
(212) 408-5100 x1189

*Attorneys for Defendants Purdue Pharma L.P., The Purdue Frederick Company Inc., Purdue Pharma Inc., The P.F. Laboratories, Inc., Michael Friedman, Howard R. Udell and Paul D. Goldenheim*

  
\_\_\_\_\_  
Michael C. Hartmere

Dated: New York, New York  
November 9, 2007

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

NEW MEXICO UNITED FOOD AND  
COMMERCIAL WORKERS UNION'S AND  
EMPLOYERS' HEALTH AND WELFARE TRUST  
FUND, on behalf of itself and all others similarly  
situated,

Plaintiff

v.

PURDUE PHARMA L.P., *et al.*,

Defendants.

07-CV-6916 (JGK)

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**AFFIDAVIT OF MATTHEW T.  
McLAUGHLIN IN SUPPORT OF  
MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

State of New York                     )  
  )       ss:  
County of New York                 )

Matthew T. McLaughlin, being duly sworn, hereby deposes and says as follows:

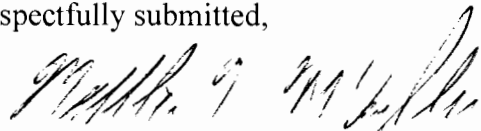
1. I am partner in Venable LLP, counsel for Defendants Abbott Laboratories and Abbott Laboratories, Inc. ("Abbott") in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Abbott's motion to admit Paul F. Strain as counsel pro hac vice to represent Abbott in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1995. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Paul F. Strain since 2005.

4. Paul F. Strain is a partner in Venable LLP, in Baltimore, Maryland. His office is located at PNC Bank Building, Two Hopkins Plaza, Suite 1800, Baltimore, MD 21201.
5. Certificates of good standing for Paul F. Strain are attached hereto as **Exhibit A**.
6. I have found Paul F. Strain to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure as well as the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York.
7. Accordingly, I am pleased to move for the admission of Paul F. Strain, pro hac vice.
8. I respectfully submit a proposed order granting the admission of Paul F. Strain, pro hac vice, which is attached hereto as **Exhibit B**.

WHEREFORE it is respectfully requested that the motion to admit Paul F. Strain, pro hac vice, to represent Defendants Abbott Laboratories and Abbott Laboratories, Inc. in the above-captioned matter, be granted.

Dated: November 9, 2007  
New York, New York

Respectfully submitted,



MATTHEW T. McLAUGHLIN (MM-6241)

*Sworn to before me this  
9th day of November, 2007*



LIAM C. EWING, JR.  
Notary Public, State of New York  
No. 02EW6114504  
Qualified in Queens County  
Commission Expires Aug. 9, 2008

# **EXHIBIT A**

**Court of Appeals  
of Maryland**  
Annapolis, MD



***CERTIFICATE OF GOOD STANDING***

*STATE OF MARYLAND, ss:*

*I, Alexander L. Cummings, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the eighteenth day of December, 1973,*

**Paul Farrell Strain**

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

**In Testimony Whereof,** *I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
twelfth day of October, 2007.*

  
Clerk of the Court of Appeals of Maryland



**State of Connecticut**  
**Supreme Court**

*I, Michèle T. Angers, Chief Clerk of the Supreme Court of the State of Connecticut and keeper of the Seal thereof,*

*Do hereby certify that, in the Superior Court at* **New Haven**  
*on the* **twelfth** *, day of* **September**  
**1972** .

**Paul Farrell Strain**

*of*

**Clarksville, Maryland**

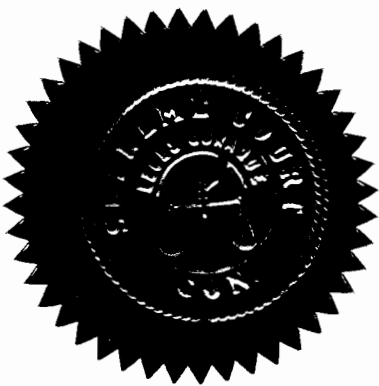
*having been examined and found duly qualified, was sworn as an attorney and admitted to practice before all the courts of this state, and that said attorney is a member in good standing of the Bar of this State pursuant to Practice Book §2-65.*

*In Testimony Whereof, I have hereunto set my hand and affix*  
*the Seal of the Supreme Court of the State of Connecticut, at*  
*Hartford, this* **second** *day of*  
**November** , 20 **07** .

A handwritten signature in cursive script that reads "Michèle T. Angers".

**Michèle T. Angers**

*Chief Clerk*







District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

PAUL F. STRAIN

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was on the 24<sup>TH</sup> day of SEPTEMBER, 1986

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duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on November 6, 2007.

GARLAND PINKSTON, JR., CLERK

By:   
Deputy Clerk

# **EXHIBIT B**

ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: \_\_\_\_\_, 2007  
New York, New York

\_\_\_\_\_  
U.S.D.J.